

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

23-mj-011-HKS

CRYSTAL QUINN,

Defendant.

**NOTICE OF MOTION REQUESTING THE COURT TO SET A RULE 48(b)
DISMISSAL DATE AND FOR EXCLUSION OF TIME UNDER THE SPEEDY
TRIAL ACT**

THE UNITED STATES OF AMERICA, by and through its attorney, Trini E. Ross, United States Attorney, Joseph M. Tripi, Assistant United States Attorney, of counsel, upon affidavit filed herewith under seal, hereby moves the Court to schedule a Rule 48(b) deadline of April 9, 2023, and for exclusion of time under the Speedy Trial Act. Counsel for the defendant, Michael D'Amico, Esq., consents to the relief sought herein.

DATED: Buffalo, New York, March 3, 2023.

TRINI E. ROSS
United States Attorney

BY: s/JOSEPH M. TRIPI
Assistant United States Attorney
United States Attorney's Office
Western District of New York
138 Delaware Avenue
Buffalo, New York 14202
716/843-5839
Joseph.Tripi@usdoj.gov